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# ***OAR Box 1192***

*Prepped by Candice Davis*

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October 30, 1990

William K. Reilly, Administrator  
U.S. Environmental Protection Agency  
401 M Street, SW  
Washington, D.C. 20460

NOV 23 1990

Dear Administrator Reilly,

In the interest of prudent public health policy, the American Lung Association requests that the U.S. Environmental Protection Agency deny Ethyl Corporation's application for a waiver from Clean Air Act requirements for HiTec 3000, a manganese-based gasoline additive.

The ALA has several concerns about the potential use of this additive, including:

- Recent tests at the EPA Ann Arbor, Michigan mobile source laboratory indicate that HiTec 3000 emitted significantly more particulate matter than unleaded gasoline.
- The potential for neurological damage and other health effects from an increase in ambient levels from the manganese-based additive are currently insufficiently defined.
- HiTec 3000 emissions may increase hydrocarbon emissions, exacerbating the contribution of motor vehicle emissions to the nation's ozone problem.

Based on the above concerns, the American Lung Association believes that the EPA approval for the use of HiTec 3000 should be withheld pending more extensive research and review of its potential effects on public health and the environment. Your cooperation in this matter is appreciated.

Sincerely,

*John R. Garrison*  
John R. Garrison  
Managing Director

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